

This policy applies to all companies under Churchill Contract Services Group Holdings Ltd to include the following subsidiaries and trading names:

- Churchill Contract Services (CCS)
- Churchill Contract Services Rail (CCSR)
- Amulet (Churchill Security Solutions) (AMU)
- Churchill Environmental Services (CES)
- Churchill Contract Catering t/a Radish (RAD)
- Churchill Complete Compliance (CCC)
- Churchill Emergency Support Ambulance Services (CESAS)
- Churchill Make Ready Ambulance Services (CMRAS)

Policy Statement

CSR is defined as the integration of business operations and values, whereby the interests of all stakeholders including investors, customers, employees, the community and the environment are reflected in the company's policies and actions.

The Churchill Group has always practiced high ethical standards and has strong values in place to ensure the outstanding reputation of the company. The standards by which we are governed today were set in motion by our founders back in 1978 – that is to conduct business with integrity, commitment and innovation. It's who we are, and that won't change. In accordance with this, we do have policies that address the various components of what makes us a good corporate citizen.

Churchill's Ethical Purchasing Policy is to seek to purchase goods and services which are produced and delivered under conditions that do not involve the abuse or exploitation of any persons, and have the minimum negative impact on the environment and forms part of our CSR Policy

We believe that nurturing good relationships with all stakeholders is the key to long-term success.

This policy will be formally reviewed annually and updated as required.

Signed on behalf of Churchill Contract Services Group Holdings Ltd

Objectives of the Policy:

The purpose of this policy is to:

- Ensure that all goods and services purchased by Churchill Contract Services are produced and delivered in an ethical manner.
- Promote good labour and environmental standards in its supply chain.
- Protect the reputation of Churchill Contract Services and its clients.

Such considerations will form part of the evaluation and selection criteria for goods and services purchased by Churchill Contract Services.

Policy in action

Ethics and Ethical Trading

- We will ensure clear visibility through our supply chains, so we know where all our products are made;
- Training will be provided to relevant people on environmental and social issues affecting our supply chains;
- We will ensure that clients, suppliers and business partners uphold the workplace standards and behaviours consistent with the Company's requirements.

Code of Conduct for Suppliers & Sub-Contractors

Churchill Contract Services Limited expects suppliers and sub-contractors to

- accept responsibility for labour and environmental conditions under which products are made and services provided.
- adopting this Code of Conduct and should commit to continuous improvement towards compliance with the labour and environmental standards specified, both in their own companies and those of their suppliers.

Labour Standards

Churchill Contract Services requires from its suppliers and sub-contractors that:

- Working conditions are safe and hygienic
- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmarks, whichever is higher.
- Working hours comply with national laws and benchmark industry standards,
- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- No employee is subjected to slavery and human trafficking activities and appropriate training to maintain awareness is available to its staff.

Environmental Standards

Churchill Contract Services Limited expects suppliers and sub-contractors to

- as a minimum comply with all statutory and other legal requirements relating to the environmental impacts of their business.

Suppliers (vendors)

Suppliers will be worked with to help us achieve our policy aspirations in the delivery of our products and services;

- ✓ We shall encourage Suppliers to adopt responsible business policies and practices for mutual benefit;
- ✓ Suppliers are regarded as partners and we will work with them to help us achieve our policy aspirations in the delivery of our products and services;
- ✓ Where necessary, we will exert procurement pressure to ensure that all of our Suppliers behave in a socially responsible way. This includes environmentally-friendly products and making sure that workers are treated properly;
- ✓ Suppliers are committed to ensuring that the welfare of workers and labour conditions within our supply chain meet or exceed recognised standards;

All suppliers and sub-contractors should have an environmental policy which ensures that:

- Waste is minimised and items recycled whenever this is practicable. Effective controls of waste in respect of ground, air, and water pollution should be adopted.
- Undue and unnecessary use of materials is avoided, and recycled materials used whenever appropriate.
- Reduce the amount of packaging and transit where possible;
- All production and delivery processes are based on the need to maximise efficient energy use and to minimise harmful emissions.
- Suppliers promote more environmentally friendly products and promote these to our customers;
- Implement schemes to take-back, recover, re-use and recycle products at the end of their use/life.

Churchill's control mechanisms

- A documented environmental and social assessment will be undertaken for every new contracted Supplier;
- Where appropriate, our tender specifications include questions to reflect our desire for sustainable procurement;
- We hold regular meetings with Suppliers to support these ideas;

This policy will be formally reviewed annually and updated as required.

Signed on behalf of Churchill Contract Services Group Holdings Ltd

A handwritten signature in black ink, appearing to read "J.M. Briggs".

J.M. Briggs, Group Managing Director

Date: July 2018

Review date: July 2018